

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

LORENZO ALBERTO ORTIZ SANTOS

Debtor(s)

Case No. 09-06619-SEK

Chapter 13

**DEBTORS' NOTICE TO OPPOSE DISMISSAL AND CONVERT CASE TO
CHAPTER 7**

TO THE HONORABLE COURT:

The undersigned, attorney for the above-named debtor(s), notifies the Court as follows,

1. The debtor(s) pursuant to 11 U.S.C. §1307(a), hereby elect(s) to convert the above captioned case to a case under chapter 7 of the Bankruptcy Code.
2. The debtor(s) is/are entitled to convert his/her/their case because:
 - a. This case filed on August 12, 2009 and confirmed on October 29, 2009, is a case under chapter 13 of the Bankruptcy Code.
 - b. The debtor(s)s is/are eligible to be debtor(s) under chapter 7 of the Bankruptcy Code

ADDITIONAL NOTICE

Within twenty (20) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.**Unless a party in interest objects to the conversion of this case within twenty (20) days from the date of this notice, the case may be converted without a hearing.**

- c. **With the present motion to convert, motion by trustee requesting dismissal becomes moot.**

WHEREFORE, we respectfully request from this Honorable Court to take notice of the informed above and enter an order accordingly.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this same date a true and exact copy of the foregoing has been filed with the Clerk of the Court by CM/ECF which will send notification of such filing to chapter 13 trustee and all other participants in electronic notifications. Non-participant has been served with a copy of the motion using the US regular mail, as per Master Address List.

In Vega Baja, Puerto Rico, on this February 19, 2011.

s/ Juan O. Calderon-Lithgow
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